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*Ray Beckerman*

January 12, 2016

By ECF

Hon. John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York NY 10007

Re: Urban Cart v Bretillot 14-CV-7599 (JGK)(AJP)  
Bretillot v Burrow 14-CV-7633(JGK)(AJP)  
Joint request for extension of discovery

Dear Judge Koeltl:

We are the attorneys for plaintiffs Clive Burrow and Urban Cart Inc., and write in response to the January 8<sup>th</sup> letter of Daniel Abraham Esq., which we interpret as a request for pre-motion conference to quash a subpoena duces tecum. A copy of the subpoena is attached herewith. Mr. Abraham's blanket refusal to comply with the subpoena fails to satisfy the requirements of Local Rule 26.2(a)(2)(A), which requires him to identify as to each document its type, date, subject, authors, addressees, other recipients, and, where not apparent, the relationships. We are not seeking anything that is privileged, such as attorney client communications, unfiled drafts, internal memos or notes. We are merely seeking what he submitted to the Copyright Office and what that Office sent to him. These communications to and from third parties are not privileged.

Thank you.

Respectfully submitted,

  
Ray Beckerman

cc: Richard A. Altman, Esq. (By ECF)  
Gregg Kanter, Esq. (By ECF)  
Daniel Abraham, Esq. (By ECF)

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

Urban Cart Inc et ano

Plaintiff

v.

Audrey Bretillot et al

Defendant

Civil Action No. 14-CV-07599 (JGK)(AJP)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Daniel Abraham Esq  
320 Seventh Ave. #109, Brooklyn NY 11215

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: all (a) copyright applications filed on behalf of Audrey Bretillot, (b) all correspondence, including emails, relating to same, (c) all deposit copies & other attachments, (d) all nonprivileged notes, memos, and other records of same. Digital files in \*pdf format acceptable.

Place: Ray Beckerman PC  
108-18 Queens Blvd, 4 Fl  
Forest Hills NY 11375

Date and Time:

01/18/2016 10:00 am

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 12/30/2016

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Urban Cart Inc. and Clive Burrow, who issues or requests this subpoena, are:

Ray Beckerman, Ray Beckerman, PC, 108-18 Queens Blvd 4 Fl, Forest Hills NY 11375, 718-544-3434,  
ray@beckermanlegal.com

## Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).